

**REMARKS**

Reconsideration and allowance of the present application are respectfully requested based on the following remarks.

Claims 1-21 stand rejected under obviousness-type double patenting over U.S. Patent No. 6,675,854 to Worth ("the '854 patent"). The Applicants respectfully request the Examiner to reconsider this rejection.

The independent claims of the present application are directed to guide features (referred to as guide structure, guide surfaces, and/or guide portions, as applicable) for guiding movement of the frame portions or the pressure applying structures. In contrast, the independent claims of the '854 patent are directed to a guide structure that engages the stock or supply materials so as to orient them in a position where the pressure applying structures will automatically engage them upon movement of the frame portions to a closed position. These are two distinct concepts. Specifically, the claimed invention of the present application relates to guiding for the movement of the frame and/or pressure applying structures, whereas the claimed invention of the '854 patent relates to a guide structure that positions the stock material.

Because of this distinction, it cannot be said that the claims of the present application are an obvious variation of the claims of the '854 patent. This is because the use of a guide structure for positioning the stock materials as claimed in the '854 patent does not provide any suggestion to provide for guidance of the frame portions or the nip rollers. At most, these claims of this application and the '854 patent share some basic common elements, and refer to guiding features, but the guiding in each refers to a different type of guiding provided for completely different purposes.

Accordingly, the Applicants submit that the claims of the present application are not obvious variations of the claims in the '854 patent, and respectfully request the Examiner to withdraw the outstanding double-patenting rejection.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance, and a Notice to that effect is earnestly solicited.

Respectfully submitted,

PILLSBURY WINTHROP LLP

A handwritten signature in black ink, appearing to read "Bryan P. Collins", is written over the printed name.

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